

**CALIFORNIA COUNCIL FOR ENVIRONMENTAL
AND ECONOMIC BALANCE
100 Spear Street, Suite 805, San Francisco, CA 94105**

VIA ELECTRONIC MAIL

August 6, 2004

The Honorable Terry Tamminen
Secretary, California Environmental
Protection Agency
1001 I Street, 25th Floor
Sacramento, CA 95814

**Re: CCEEB's Comments regarding the July 2004 Draft Cal/EPA Intra-
Agency Environmental Justice Strategy**

Dear Secretary Tamminen:

The California Council for Environmental and Economic Balance ("CCEEB") is a coalition of business, labor and public leaders that strives to advance collaborative strategies that protect public health and the environment while allowing California's economy to grow. CCEEB was an active participant in the development of SB 89 (Escutia, 2000). CCEEB supported the final version of that bill which established the environmental justice strategy and gap identification requirements. Following are CCEEB's comments regarding the July 2004 draft of the Cal/EPA Intra-Agency Environmental Justice Strategy (the "Draft Strategy").

1. General Comment

On May 21, 2004, CCEEB submitted written comments to you and your staff regarding the April 23, 2004 Staff Proposal entitled: Recommendations for the Development of an Intra-agency Environmental Justice Strategy. The July 2004 version of the Draft Strategy addresses many of those comments. We appreciate your Staff's work to address the comments.

2. Specific Comment – CCEEB Suggests that Cal/EPA State in the Strategy that Cal/EPA and the BDOs Will Take into Account the Cost-Effectiveness of Measures and the Impacts on the Creation and Retention of Jobs and Business Climate as They Develop and Consider Options for Solutions to Environmental Justice Problems.

In CCEEB's May 21, 2004 comments, we suggested that Cal/EPA note in the document that it is important for the Boards, Departments and Office ("BDOs") to take into account the cost-effectiveness of measures and the impact on jobs retention and creation and business climate when developing solutions to environmental justice issues. At the second paragraph

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of Page 12 of the Draft Strategy, Cal/EPA has added text regarding the mutually beneficial relationship of the environment and the economy. This new language presents an important message. However, as explained below, the inclusion in the Strategy of additional language in this area is appropriate.

CCEEB recognizes that Cal/EPA's environmental justice mission is to ensure the fair treatment of all Californians as the Agency and its BDOs develop, adopt, implement and enforce its programs. We believe that Cal/EPA can accomplish that mission while taking into account the cost-effectiveness of measures and the impacts of measures on the creation and retention of jobs and business climate. As Cal/EPA and the BDOs move forward to develop solutions for addressing environmental justice gaps, there are likely to be **multiple effective options for addressing a particular gap**. One option will likely be more cost-effective than another option. One option will likely have less of an impact on jobs or business climate than another option will have on jobs or business climate. If the State can develop effective solutions that minimize the impacts on jobs and business climate, the State will be meeting the environmental justice mandates in an effective and prudent way.

In its October 2003 recommendations report (at the top of Page 15), the Advisory Committee on Environmental Justice wrote:

“(...) the Committee urges those who would take action to address environmental justice issues with a community to strive for solutions that do not have an adverse economic impact on the community or jobs (...).”

Thus, the Advisory Committee recognized the need to take into account employment and economic impacts.

Accordingly, CCEEB suggests that Cal/EPA state in the Strategy that Cal/EPA and the BDOs will take into account the cost-effectiveness of measures and the impacts on the creation and retention of jobs and business climate as they develop and consider options for solutions to environmental justice problems.

CCEEB appreciates Cal/EPA's consideration of these comments. If you have any questions, or if you would like to discuss the comments, please contact me at (415) 512-7890 or Cindy Tuck at (916) 442-4249.

Sincerely,

VICTOR WEISSER
President

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Via Electronic Mail

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